

## REMARKS

This is in response to the final Office Action mailed on May 30, 2008. The Office Action rejected Applicant's Claims 1, 3, 4, 6 and 7 as being obvious in view of the combination of US Pat. No. 6,084,989 (Eppler), US Pat. No. 6,766,062 (Donoho) and "An Investigation into the Applicability of the Wavelet Transform to Digital Stereo Image Matching" (Moon) and Claim 8-27 as being obvious in view of the combination of Eppler and Moon. Applicant respectfully requests the Examiner to reconsider the present application in view of the following remarks. Applicant submits that all pending claims are in condition for allowance.

### Independent Claim 1

Independent Claim 1 recites "storing the wavelet coefficients in a computer-usable database on a physical storage medium, the coefficients being usable for displaying a representation of the geographic feature in the computer-based system." The Office Action at page 3 stated that Eppler disclosed this claim element; however, Applicant respectfully points out that Eppler does not disclose or suggest this claim element.

Eppler discloses a method for determining the position of landmarks in digitized images from satellite-based systems. Eppler discloses a landmark database 27 containing perimeter information (longitude and latitude boundary vertices) for landmarks. Eppler also discloses a softcopy map database 28 containing digitized images from the satellite-based imaging system. The Eppler method displays the digitized image from the softcopy database 28 on a display. The Eppler method then obtains the boundary vertices for the landmark obtained from the landmark database 27 for processing to determine offset errors. (see Eppler: Fig.4, col. 16, lines 46-61).

Eppler does not disclose storing wave coefficients; rather, Eppler only discloses storing digitized images and boundary vertices. The Office Action at page 3 even states that Eppler does not specifically teach wavelet coefficients, so there is no way Eppler can disclose or teach storing the wavelet coefficients or the coefficients being usable for displaying a representation of the geographic feature. The only thing Eppler teaches is usable for display is the digitized image.

Moon was cited for providing the wavelet transform equation on page 76 of Moon. Donoho discloses applying the wavelet transform to a pixel representation of an image to provide wavelet coefficients. (see Donoho: col. 1, lines 20-48). The wavelet coefficients from Donoho are used to provide a compressed representation of the image or for statistical estimate, not the recited claim element of displaying a representation of the geographic feature. (see Donoho: col. 2, lines 9-12). Both Donoho and Moon fail to disclose or teach storing wavelet coefficients or these stored wavelet coefficients being usable for displaying a representation of the geographic feature. There are no teachings in Donoho or Moon to replace the digitized image of Eppler with wavelet coefficients.

For at least these reasons, Claim 1 is not obvious in view of the combination of Eppler, Donoho and Moon.

#### Independent Claims 8 and 11

Independent Claim 8 recites “retrieving from a computer-usable database a plurality of wavelet coefficients associated with the geographic feature” “computing a function that represents the geographic feature using the retrieved wavelet coefficients; and using the function to display the representation of the geographic feature.” Independent Claim 11 recites “a database storing a plurality of wavelet coefficients” “a processor configured to calculate the representation of the geographic feature at a predetermined display scale using the wavelet coefficients associated with the predetermined display scale; and a display device for displaying the representation of the geographic feature..” Claims 8 and 11 are not obvious in view of the combination of Eppler and Moon for the some of the same reasons discussed above in conjunction with Claim 1. That is, both Eppler and Moon fail to disclose or teach storing or retrieving wavelet coefficients. Rather, Eppler discloses retrieving boundary vertices from landmark database 27 and digitized images from the softcopy database 28. Additionally, Eppler and Moon do not disclose or teach using the wavelet coefficients to display the representation of the geographic feature. In contrast, Eppler merely displays the digitized image. There are no teachings in Moon to replace the digitized image of Eppler with wavelet coefficients. For at least these reasons, Claims 8 and 11 are not obvious in view of the combination of Eppler and Moon.

Independent Claims 13 and 16

Independent Claim 13 recites “storing the wavelet coefficients in the computer-usable database.” Independent Claim 16 recites “a second computer-usable database on a physical storage medium, operatively coupled to the processor, for storing the wavelet coefficients.” Claims 13 and 16 are not obvious in view of the combination of Eppler and Moon for the same of the same reasons discuss above in conjunction with Claim 1. That is, both Eppler and Moon fail to disclose or teach storing wavelet coefficients. Rather, Eppler discloses storing boundary vertices in the landmark database 27 and digitized images in the softcopy database 28. There are no teachings in Moon to replace the digitized image of Eppler with wavelet coefficients. For at least these reasons, Claims 13 and 16 are not obvious in view of the combination of Eppler and Moon.

Independent Claims 20 and 24

Independent Claim 20 recites “generating the database error metric based on a wavelet transform involving the first and second pluralities of wavelet coefficients, wherein said database error metric provides a measurement comparing said first cartographic database and said second cartographic database.” Independent Claim 24 recites “the processor generating a database error metric based on the first and second pluralities of wavelet coefficients, wherein said database error metric provides a measurement comparing said first cartographic database and said second cartographic database.” Claims 20 and 24 are not obvious in view of the combination of Eppler and Moon.

The Office Action at pages 14 and 16 stated the Eppler discloses the claim element of generating the database error metric as Eppler’s offset errors. Applicant respectfully points out that Claims 20 and 24 both define the database error metric as providing a measurement comparing two cartographic databases. In contrast, the offset errors in Eppler do not provide a measurement comparing two cartographic database. Rather, the offset errors provide the misregistration of the digitized image from the satellite as compared to the ground truth. (see Eppler: col. 1, line 66 – col. 2, line 5). Moon also fails to disclose the recited database error metric. Accordingly, Claims 20 and 24 are not obvious in view of the combination of Eppler and Moon.

Dependent Claims 6 and 19

Dependent Claim 6 recites “computing the wavelet coefficients by performing a least-squares fit.” Dependent Claim 19 recites “wherein the wavelet coefficients are computed by performing a least-squares fit.” The Office Action indicated at page 6 that this claim element was disclosed by Eppler and Moon. Applicant points out that the least squares fit in Eppler is to determine the orbit and attitude of the satellite imaging system (see Eppler, col. 6, line 5-7), not the recited wavelet coefficients. Additionally, Moon merely discloses the wavelet transform equation not computing the wavelet coefficients by a least-squares fit. Accordingly, Claims 6 and 19 is not obvious in view of the combination of cited references.

Dependent Claim 9

Claim 9 recites “performing a zooming operation.” The Office Action on page 17 cited Eppler as disclosing the zooming operation; however, Eppler merely discloses different digitized hardcopy maps having different scales: a Digital Chart of the World map with 1:1,000,000 scale and a ADRG map with 1:250,000 scale. The Eppler system does not perform the zoom operation between these scales; rather, Eppler merely displays the separate digital maps. (see Eppler, col. 15, lines 48-65). Additionally, Moon doesn’t disclose the zooming option. Accordingly, Claim 9 is not obvious in view of the combination of cited references.

Dependent Claims 3-4, 6-7, 9-10, 12, 14-15, 17-19, 21-23 and 25-27

Applicant’s dependent Claims 3-4, 6-7, 9-10, 12, 14-15, 17-19, 21-23 and 25-27 are allowable at least for the reason that they depend upon allowable base claims. In addition, these claims include features that are not disclosed by the cited references.

## **Conclusion**

With the present response, all the issues in the Office Action mailed May 30, 2008 have been addressed. Applicant submits that the present application has been placed in condition for allowance. If any issues remain, the Examiner is requested to call the undersigned at the telephone number indicated below.

Respectfully submitted,

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